Roadmap for Compliance - 2025

This Roadmap for Compliance and Compliance Assessment Checklist (CAC) have been developed to assist public bodies in evaluating their level of compliance with the legislative, regulatory, and operational frameworks governing public procurement and the disposal of public property in Trinidad and Tobago. These tools are not intended to serve as an exhaustive list of all requirements necessary for full compliance with the Public Procurement and Disposal of Public Property Act, 2015 (as amended), the associated Regulations, and the Office's Handbooks and Guidelines. Rather, they highlight the core elements and minimum expectations that form the foundation for achieving and sustaining full compliance.

A. Codes of Conduct for Public Procurement, Retention & Disposal of Public Property

A Code of Conduct for Public Officers and Suppliers and Contractors involved in public procurement and the disposal of public property establishes the standards of behaviour expected of all stakeholders. It ensures adherence to the overarching values and principles set out in section 5 of the Public Procurement and Disposal of Public Property Act, 2015 (as amended) ("the Act").

The Board, Management, and all officers of a Public Body must actively demonstrate their commitment to the provisions of the Code of Conduct and the objects of the Act through their decisions, actions and day-to-day behaviour. This leadership by example is essential to setting the right tone at the top and fostering a culture of integrity, transparency and compliance within the organisation.

Public Bodies must also ensure that key stakeholders in the public procurement and disposal processes share a common understanding of the values, principles and expected standards of conduct outlined in the Code. This can be achieved through the development and implementation of a comprehensive training and sensitisation plan for all stakeholders.

In this regard, Public Bodies must ensure that they have:

1. **Established a Code of Conduct for Public Procurement, Retention and Disposal of Public Property** in keeping with the objects of the Act and the Handbook with General Guidelines: Ethical Code of Conduct for Public Bodies and Public Officers issued by the Office. *Pursuant*

to section 30 (1) (a) of the Act, Public Bodies shall utilise one (1) of the following based on the applicability to their respective operations:

- 1: Comply with the Handbook with General Guidelines: Ethical Code of Conduct for Public Bodies and Public Officers issued by the Office.
- 2: Prepare Handbooks with Special Guidelines, using the Office's prescribed template (which requires a description of the public body, its mandate, and any special or unique circumstances, including exemptions and/or amendments to the Handbook with General Guidelines); and
- 3: Submit the completed Handbook with Special Guidelines to the Office for approval.

2. Implemented the approved Handbook with General Guidelines: Ethical Code of Conduct for Public Bodies and Public Officers or Handbook with Special Guidelines as approved by the Office.

3. Established a Code of Conduct for Suppliers and Contractors in accordance with the Handbook with General Guidelines: Ethical Code of Conduct for Suppliers and Contractors. *Public Bodies shall utilise one (1) of the following based on the applicability to their respective operations:*

   - 1: Comply with the Handbook with General Guidelines: Ethical Code of Conduct for Suppliers and Contractors issued by the Office.
   - 2: Prepare Handbooks with Special Guidelines, using the Office's prescribed template (which requires a description of the public body, its mandate, and special or unique circumstances, including exemptions and/or amendments to the Handbook with General Guidelines); and
   - 3: Submit the completed Handbook with Special Guidelines to the Office for approval.

4. Included and/or Referenced the Code of Conduct for Suppliers and Contractors in all standard bidding or solicitation documents to guide the behaviour of Suppliers or Contractors. *[The Handbook with General Guidelines: Ethical Conduct for Suppliers and Contractors require that the Handbook with General Guideline be referenced in the standard bidding documents of procuring entities. By referencing the Code, it becomes binding on suppliers or contractors, who are required to commit to it by signing the form set out in Appendix 1 of the Handbook with General Guidelines].*

5. **Developed a Training Plan** for staff and stakeholders to promote a shared understanding of the values enshrined in both Codes of Conduct. *[To drive compliance with the Codes, Public Bodies are required to develop a plan to train staff and stakeholders on the contents of both General Guidelines].*

6. **Implemented the Training Plan** to ensure that staff and stakeholders are adequately sensitised to the ethical requirements and standards of behaviour outlined in the Codes.

B. Internal Control Framework for Procurement, Retention & Disposal of Public Property

An internal control framework provides reasonable assurance that a Public Body's objectives will be achieved efficiently and effectively. A robust internal control framework enables Executive Management to identify and mitigate risks that could affect operational objectives, while strengthening accountability and safeguarding public resources. The Internal Control Framework for Procurement, Retention and Disposal of Public Property serve as a critical instrument for strengthening accountability, enhancing transparency, and ensuring clarity in roles and responsibilities. Public Bodies must implement appropriate internal control activities to mitigate risks that could impede the achievement of procurement and disposal objectives.

In this regard, Public Bodies must ensure that they have:

7. **Developed an Internal Control Framework** for Procurement, Retention and Disposal of Public Property in keeping with the Handbook with General Guidelines: Framework of Internal Control for Procurement issued by the Office (to ensure the effectiveness and efficiency of the operations of the Public Body). *Public Bodies must comply with the following when establishing an Internal Control Framework for Procurement based on the applicability to their respective operations:*

    - 1: Comply with the Handbook with General Guidelines: Framework of Internal Control for Procurement issued by the Office.
    - 2: Prepare Handbooks with Special Guidelines, using the Office's prescribed template (which requires a description of the public body, its mandate, and special or unique circumstances, including exemptions and/or amendments to the Handbook with General Guidelines); and
    - 3: Submit completed Handbook with Special Guidelines to the Office for approval.

8. **Established a Delegation of Authority** for the conduct and management of public procurement and disposal activities.

9. **Developed a system to monitor and control the reporting of "one-time" waivers** granted to suppliers and contractors under Regulations 10(1)-(4) of the Simplified Procurement Regulations, 2024.

10. **Established and maintains a Register of Complaints** as required under Regulation 47 (1) of the Simplified Procurement Regulations, 2024

C. Institutional Capacity Assessment and Organisational Structure for Procurement, Retention & Disposal

Each Public Body or organisation utilising public money must ensure that it possesses the institutional and human capacity necessary to efficiently execute procurement, retention and disposal functions. Public Bodies must have undertaken an assessment to determine the capacity needs for the establishment of a Procurement and Disposal Function or to enhance the existing capacity based on size, mandate, and level of expenditure.

In this regard, Public Bodies must ensure that they have:

11. **Conducted an Institutional Capacity Assessment** to evaluate the Public Bodies capacity to effectively and efficiently execute procurement, retention, and disposal activities in compliance with the Act, Regulations and Handbook with General Guidelines. *This assessment is critical for building a robust procurement system, as both institutional and individual capacity development are key to achieving efficiency and compliance.*

12. **Assessed the Capacity Needs of the Public Body to undertake Procurement, Retention and Disposal** of public property based on the mandate and characteristics of the Public Body (size, expenditure, risk, and quantum of disposals) and in keeping with:
    - The Training Standards, Competence Levels and Certification Requirements for Procurement; and
    - The Training Standards, Competence Levels and Certification Requirements for Retention and Disposal of Public Property.

13. **Established an Organisational Structure** for Procurement, Retention and Disposal that reflects the capacity needs identified. *[As a model, the Handbook with General Guidelines: Framework of Internal Control for Procurement provides a sample organisational structure for a large Public Body].*

14. **Defined Functional Responsibilities and Reporting Relationships** within the Public Body and the Procurement and Disposal Unit in alignment with the Handbook with General Guidelines: Framework for Internal Control. *[Accounting Officers as defined by the Exchequer and Audit Act, Chapter 69:01 are accountable for the financial performance of their respective procuring entities. Accounting Officers may delegate responsibilities for tasks associated with the management of procurement and the disposal of public property to procurement staff within their respective Public Bodies].*

15. **Developed Job descriptions and Budget(s)** for the recruitment, training, development, and retention of staff with the required competencies.

16. **Obtained the necessary Approval(s) and Budget(s)** for the staffing and operations of the Procurement and Disposal Unit.

D. Procurement, Retention & Disposal Functions

Having identified the human resource requirements in the capacity assessment undertaken, Public Bodies must establish the functional mechanisms to operationalise the Procurement, Retention & Disposal Function as follows:

17. **Appointed a 'Named' Procurement Officer (NPO)** with the appropriate level of competence to manage the procurement and disposal portfolio of the Public Body. *[The 'Named' Procurement Officer is the person defined in the Public Procurement and Disposal of Public Property Act, 2015 at Section 61 (2), as the person "who shall be responsible for public procurement and disposal of public property for that public body". Regulation 3 of the Procurement Methods and Procedures Regulations, 2021 requires that the NPO shall be "suitably qualified, experiences and competent…"].*

18. **The Office was notified in writing**, of any changes to the name and designation of the NPO, as required by the Act.

19. **Assigned a trained, technically capable Public Officer** to effectively oversee and manage the receipt, storage, issuance, disposal and identification of stores and equipment (Stores & Inventory Management Officer). *[This requirement is outlined in Regulation 5 (5) of the Public Procurement and Disposal of Public Property (Retention and Disposal of Personal Property) Regulations, 2021].*

20. An assigned Public Officer was delegated to perform functions in relation to the effective retention of stores and equipment. *[In accordance with Regulation 5 (3) of the Public Procurement and Disposal of Public Property (Retention and Disposal of Personal Property) Regulations, 2021].*

E. Systems & Safeguards to Support Public Procurement, Retention & the Disposal of Public Property

Public Bodies must ensure that effective systems, procedures and controls are established to support the efficient management and execution of procurement, retention, and disposal activities. In doing so, they must safeguard the public property entrusted to them and preserve or enhance its value.

In this regard, Public Bodies must ensure that they have:

21. Established a system to assess and manage risks associated with procurement, retention and disposal activities, using appropriate risk management software, tools, and techniques.

22. Established a comprehensive Records Management System. [*In accordance with Regulation 3 and 6 (1) of the Public Procurement and Disposal of Public Property (Record of Procurement Proceedings) Regulations, 2021. Public bodies must maintain easily accessible, and retrievable records for each procurement proceeding, which shall be marked with the record management reference number, be accurately maintained, kept up to date and may be in electronic form. These records will also provide documentary evidence in the event of an audit, debriefing or a challenge].*

23. Implemented systems to facilitate timely response to, and dissemination of, information and/or documentation to relevant stakeholders. *[Information and documentation may be required in relation to queries, debriefings, audits, challenge proceedings, during the standstill period, and any other related matters].*

24. Established and maintains measures to safeguard the integrity, reliability and accuracy of procurement and disposal records, both in hard copy and where possible, in electronic format. *[In keeping with Regulation 6 (2) of the Public Procurement and Disposal of Public Property (Record of Procurement Proceedings) Regulations, 2021].*

25. Established a Stores and Inventory Management System to manage stock levels, (including economic order quantities, reorder levels, and where appropriate, buffer stock in an electronic format) (where possible). *[In accordance with Regulation 5 (5), (6), and (7) of the*

Public Procurement and Disposal of Public Property (Retention and Disposal of Personal Property) Regulations, 2021].

26. Assessed the risks associated with the retention and disposal of personal property of the public body and implemented appropriate risk mitigation strategies based on the impact and likelihood of the risks identified. *[Regulation 4 (7) of the Public Procurement and Disposal of Public Property (Retention and Disposal of Personal Property) Regulations, 2021 requires that in considering the mitigation strategy to be applied for the risk, the Public Body shall ensure that the mitigating action is in alignment with, and does not outweigh, the likelihood of the potential risk occurring.]*

27. Implemented measures to safeguard and maintain public property, based on identified risks. *[In accordance with Regulation 4 (1) of the Public Procurement and Disposal of Public Property (Retention and Disposal of Personal Property) Regulations, 2021 a Public Body shall ensure that it protects and maintains the personal property with which it is entrusted in a manner designed to maximise the use of, and where applicable, preserve or enhance the value of, the personal property.]*

28. Developed a written risk mitigation policy outlining the objectives for the retention of stores and equipment in accordance with the objects of the Act and Regulations. *[Pursuant to Regulations 5 (1)(2) of the Public Procurement and Disposal of Public Property (Retention and Disposal of Personal Property) Regulations, 2021].*

29. Notified the Office of the name, designation, and contact details of the Accounting Officer and 'Named' Procurement Officer via official correspondence, using the Office's template, "Public Body's Letter Template – New User Request" (to be granted access to the Procurement Depository) *[The template of the letter to request access to the Procurement Depository can be accessed at Public-Body-Letter-Template-New-User.docx (live.com)].*

30. Obtained access to the Procurement Depository and reviewed the resources available on the Office's website in relation to utilising the Procurement Depository. *[Section 26 (1) of the Act requires that the Office shall establish a database, to be known as "the Procurement Depository", to which suppliers or contractors can submit information with respect to, among other things, their qualifications and experience. The Procurement Depository is being utilised by the Office to facilitate the pre-qualification process, the "Procurement Depository - Public Body User Guide" provides guidance and resources to assist Public Bodies in this regard].*

31. **Created appropriate Line(s) of Business** on the Procurement Depository by selecting the relevant UNSPS code(s) that accurately corresponds to the goods, works and services procured by the Public Body. *[Each Public Body is required to create the Line(s) of Business ("LoB") that aligns with its operational needs and intended procurement activities. In doing so, the Public Body must familiarise itself with the UNSPS codes classification system to ensure accurate code selection and facilitate effective categorisation of procurement activities].*

32. **Assessed requests for pre-qualification** from suppliers and contractors. *[In accordance with Regulation 4 (1) of the Public Procurement and Disposal of Public Property (Pre-qualification and Pre-selection) Regulations, 2021 "a supplier or contractor may be pre-qualified by a procuring entity for the line(s) of business and value category of goods, works and services that the procuring entity may procure where–*
    (a) the supplier or contractor has registered in the Procurement Depository and submitted a request for pre-qualification; or
    (b) the procuring entity has issued an invitation to pre-qualify for a specified procurement proceeding pursuant to sub-regulation (4) and the supplier or contractor has made a submission in the Procurement Depository in response to the invitation".

    When assessing requests for pre-qualification, the Public Body must ensure that the supplier or contractor meets the requirements set out in section 29(1) of the Act].

33. **Updated information on the Procurement Depository** to reflect all disposals. *[Section 13 (1) (a) of the Act requires that the Office establish a comprehensive database of information on public procurement, including information on tenders received, the award and value of contracts, and such other information of public interest as the Office thinks fit. In keeping with this requirement, Public Bodies are required to update the information in relation to disposals on the Procurement Depository].*

34. **Established and maintains an internal registry of suppliers or contractors** for micro-procurement activities, in keeping with Regulations 26 and 27 of the Simplified Procurement Regulations, 2024.

F. Handbooks with Guidelines

The Handbooks with Guidelines, issued by the Office, or where applicable, Handbooks with Special Guidelines approved by the Office and tailored to a Public Body's operational context, play a crucial role in ensuring compliance with the Act, and the Regulations, while supporting the achievement

of each Public Body's strategic mandate. To ensure that procurement and disposal actions are executed in accordance with the Act, Regulations, and the applicable Handbooks with Guidelines, Public Bodies must ensure the following:

35. **Complied with the Handbook with General Guidelines** issued by the Office or developed Handbook with Special Guidelines on Public Procurement, Retention and Disposal of Public Property in conformance with the template and guidelines issued by the Office. *[In keeping with Section 30 (1) (2) and Section 13 of the Act the Office has issued model handbooks with guidelines in relation to public procurement and the retention and disposal of public property for use by Public Bodies in executing their procurement, retention, and disposal activities. As such, when developing Handbooks with Guidelines, Public Bodies can utilise one (1) of the following based on the applicability to their respective operations:*

    - 1: Comply with the Handbook with General Guidelines issued by the Office in relation to Public Procurement, Retention & Disposal.
    - 2: Prepare Handbooks with Special Guidelines, using the Office's prescribed template (which requires a description of the public body, its mandate, and any special or unique circumstances, including exemptions and/or amendments to the Handbook with General Guidelines); and
    - 3: Submit the completed Handbook with Special Guidelines to the Office for approval.

G. Procurement & Disposal Advisory Committee (PDAC) & the Disposal Committee

In accordance with Regulation 21 of the Public Procurement and Disposal of Public Property (Procurement Methods and Procedures) Regulations, 2021, each Public Body is required to establish a Procurement and Disposal Advisory Committee (PDAC). As outlined in Regulation 21 (5), the PDAC provides oversight of the Public Body's procurement and disposal activities and offers assurance to the Accounting Officer that these activities are conducted in compliance with the Act, it objects, Regulations, Handbooks with Guidelines, and the approved Procurement and Disposal Forms, where applicable. Additionally, section 55 of the Act requires Public Bodies to establish an operational committee, referred to as the Disposal Committee. This operational committee is responsible for recommending the most appropriate method of disposing of unserviceable, obsolete, or surplus stores or equipment.

In this regard, Public Bodies must ensure that they have:

36. **Appointed members and alternate members** to the Procurement and Disposal Advisory Committee (PDAC) comprising:
    - Corporate Secretary/Head of Legal
    - Head of Finance
    - Subject Matter Expert
    - such other members as may be necessary *[The composition of PDAC is outlined in Regulation 21 (2) of the Public Procurement and Disposal of Public Property (Procurement Methods and Procedures) Regulations, 2021. Note that, in the absence of the requisite internal resources Public Bodies can source members from other Public Bodies. Public Bodies shall also appoint a Senior Officer to serve as Secretary to attend all meetings. The Secretary shall not be a member of PDAC].*

37. **Developed Terms of Reference** for the PDAC and informed members of their roles and responsibilities, including review of reports, recommendations for contract award and procurement proceedings and property disposal files to ensure:
    - adherence to the Act and the Regulations;
    - adherence to the Handbook with General Guidelines;
    - adherence to the approved procurement/disposal strategy; and
    - achievement of the objects of the Act.

    [Regulation 21 (5) of the Public Procurement and Disposal of Public Property (Procurement Methods and Procedures) Regulations, 2021 outlines the role of PDAC. To ensure that the members of PDAC and key stakeholders have a common understanding of roles, responsibilities scope, objectives and processes that govern the operations of PDAC, it is recommended that Terms of Reference be developed].

38. **Established a Disposal Committee** comprising no less than three (3) officers as required.

    [The Handbook with General Guidelines: Retention of Public Property and Disposal of Personal Property recommends the following composition of the Disposal Committee:
    - *asset management officer*
    - *stores & inventory management officer or any as delegated from within the procurement unit and*
    - *a third alternate member or subject matter technical expert, from either within or outside the organisation].*

39. **Developed Terms of Reference** for the Disposal Committee and informed members of their roles and responsibilities in recommending the most appropriate method of disposing of unserviceable, obsolete, or surplus stores or equipment in keeping with the Act.

H. Training & Capacity Building

The Act governs the procurement, retention and disposal of public property and sets the framework within which Public Bodies and procurement actors must operate as custodians of public monies. This system requires that individuals and institutions involved in executing the procurement function are highly skilled and capable, for the benefits to be derived in full. Procurement practitioners must therefore be well equipped to handle the increasing complexity of procurement within their respective Public Bodies, whilst staff must also understand the requirements of the new legislative framework.

In this regard, Public Bodies must ensure that they have:

40. **Provided internal training for staff**: sensitising staff on the Public Procurement and Disposal of Public Property Act, Regulations, Handbook with General Guidelines and Handbook with Special Guidelines approved by the Office for the Public Body.

41. **Assessed the competencies** of the Staff of the Procurement and Disposal Units annually against the Standards developed by the Office.

    - Training Standards, Competence Levels and Certification Requirements for Procurement; and Training Standards, Competence Levels and Certification Requirements for Retention and Disposal of Public Property. *[These Standards are expected to assist in the development of public procurement capacity, by identifying the knowledge, skills, and competencies that public procurement practitioners operating at the basic, intermediate, or advanced levels in procurement, retention and disposal of public property should possess].*

42. **Developed a Capacity Development Plan** for the staff of the Procurement and Disposal Unit based on any gaps identified. *[The Handbook with General Guidelines: Developing Procurement Capacity developed by the Office establishes a framework that Public Bodies can use in their assessment of procurement capacity, it provides guidance and information to support Public Bodies in developing their procurement capacity].*

43. **Provided training opportunities** to procurement and disposal staff based on any gaps identified in performance/competence.

I. Annual Procurement Plan & Annual Schedule of Planned Procurement Activities

Preparing the Annual Procurement Plan (APP) facilitates more efficient and effective use of public funds, it contributes to the achievement of value for money and improves the likelihood of Public Bodies achieving their respective procurement objectives. The APP is a key instrument for successful procurement implementation, it facilitates sound judgment and the selection of the most suitable procurement approach, while also identifying aspects of procurement to be targeted for performance improvement.

In this regard, Public Bodies must ensure that they have:

44. **Prepared the Annual Procurement Plan (APP) and Annual Schedule of Planned Procurement Activities (ASPPA)** within six (6) weeks of the approval of National Budget, and obtained the approval of the Accounting Officer. *[The 'Named' Procurement Officer, in collaboration with the Public Body's Budget Holders must prepare the APP and the ASPPA within six (6) weeks of the approval of the National Budget. The APP provides details of the items to be procured for the period, risk and market analyses, procurement strategies and objectives, and contract management strategies for the spend categories. The ASPPA is a tabular representation of information regarding all planned procurement activities for the twelve (12) month fiscal period. Public Bodies can refer to the Handbook with General Guideline: Developing the Annual Procurement Plan for the relevant templates.]*

45. **Published the Annual Schedule of Planned Procurement Activities (ASPPA)** for the current fiscal on ProcureTT, the Public Body's website, or any other electronic format. *[Public Bodies are required under Section 27 (1) of the Act, to publish on its website or in any other electronic format, information regarding all planned procurement activities for the following twelve months, no later than six (6) weeks after the approval of the National Budget. Of note, public bodies are required to immediately provide evidence of said publication to the Office].*

J. Mechanisms for compliance with Reporting Requirements

The Act, Regulations, Handbooks with General Guidelines outline several reporting requirements that Public Bodies must comply with as part of the thrust to promote transparency as well as to ensure that the procurement system is functioning as required. To

facilitate this, Public Bodies must ensure that appropriate mechanisms are established to facilitate reporting as follows:

46. **Published notices of award of procurement contracts or framework agreements** for procurement valued over **One Million Dollars (TTD 1 Mn)** upon entry into force of a procurement contract or conclusion of a framework agreement on ProcureTT, the Public Body's website, or any other electronic format. *[Section 36 (1) of the Act requires that Public Bodies promptly publish on its website or in any other electronic format notice of the award of the procurement contract or the framework agreement, specifying:*
    - *the name of any supplier or contractor with whom the procurement contract or framework agreement was entered into;*
    - *the goods or services to be supplied, the works to be effected; and*
    - *in the case of procurement contracts, the date of the award of the contract and the contract price].*

47. **Prepared and submitted quarterly reports to the Office.** *[Section 37 of the Act and Regulations 29 and 38 of the Simplified Regulations, requires that Public Bodies submit to the Office no later than three (3) weeks after the end of each quarter a report of all contracts awarded during the immediately preceding quarter].*

48. **Prepared the Annual Procurement Performance Report**, within six (6) weeks of the end of the fiscal year, in accordance with the Annual Procurement Performance Report Template issued by the Office. *[The Annual Procurement Performance provides details of the performance of the procurement function during the fiscal year, comparing planned with actual activities and outcomes for each category of expenditure. This report must be developed by the 'Named' Procurement Officer and approved by the Accounting Officer. The report provides details of the performance of the procurement function during the fiscal year, comparing planned with actual activities and outcomes for each category of expenditure].*

49. **Prepared and submitted ALL other reports** as requested by the Office. *[In executing its oversight function, the Office may request that Public Bodies provide information on matters relating to the procurement, retention, and/ or disposal of public property. Accordingly, Public Bodies are required to prepare and submit such reports in the manner, format, and within the timeframe prescribed by the Office].*

50. **Established internal mechanisms** to ensure timely compliance with all statutory and regulatory reporting requirements of the Act, Regulations and Handbooks with General Guidelines.

51. **Submitted quarterly reports to the Office** on the status or outcome of each complaint. Regulation 47 (2) of the Simplified Procurement Regulations, 2024, states that a procuring entity shall submit to the Office on a quarterly basis, in accordance with the guidelines, a report on the status or outcome of each complaint made against it.

K. Internal Systems to Monitor Performance & Ensure Compliance

Continuous monitoring and performance evaluation are essential to maintaining compliance and promoting improvement in procurement and disposal functions.

In this regard, Public Bodies must ensure that they have:

52. **Developed and implemented an action plan** to ensure ongoing compliance with the Act, Regulations and Handbooks with General Guidelines.

53. **Established internal monitoring mechanisms** to regularly evaluate the performance of the procurement and disposal functions.

54. **Continuously monitored** the execution of procurement and disposal against performance plans and identify weaknesses, gaps or non-compliance.

55. **Implemented corrective and improvement measures** to address identified gaps, ensuring continuous enhancement of procurement and disposal functions and institutional integrity. *[After monitoring and assessing the performance of the procurement and disposal unit, Public Bodies must implement measures to improve performance and address identified gaps. Implementing such continuous improvement programmes is critical to strengthening an efficient and effective procurement disposal function within the Public Body].*

Compliance Assessment Checklist - 2025

Name of Public Body: _____

	COMPLIANCE ASSESSMENT CHECKLIST - 2025	Yes	No
No.	**A. Codes of Conduct for Public Procurement, Retention & Disposal of Public Property**		
1.	Established a Code of Conduct for Public Procurement, Retention and Disposal of public property in keeping with the objects of the Act and the Handbook with General Guidelines: Ethical Code of Conduct for Public Bodies and Public Officers issued by the Office. Select applicable option(s): 1: Comply with the Handbook with General Guidelines: Ethical Code of Conduct Public Bodies and Public Officers issued by the Office. 2: Prepare Handbooks with Special Guidelines, using the Office's prescribed template; and 3: Submit the completed Handbook with Special Guidelines to the Office for approval.	☐ ☐ ☐	☐ ☐ ☐
2.	Implemented the approved Handbook with General Guidelines: Ethical Code of Conduct for Public Bodies and Public Officers or Handbook with Special Guidelines as approved by the Office.	☐	☐
3.	Established a Code of Conduct for Suppliers and Contractors in accordance with the Handbook with General Guidelines: Ethical Code of Conduct for Suppliers and Contractors.		

	COMPLIANCE ASSESSMENT CHECKLIST - 2025	Yes	No
	Select applicable option(s): 1: Comply with the Handbook with General Guidelines: Ethical Code of Conduct for Suppliers and Contractors issued by the Office. 2: Prepare Handbooks with Special Guidelines, using the Office's prescribed template; and 3: Submit the completed Handbook with Special Guidelines to the Office for approval.	☐ ☐ ☐	☐ ☐ ☐
4.	Included and/or Referenced the Code of Conduct for Suppliers and Contractors in all standard bidding or solicitation documents to guide the behaviour of Suppliers or Contractors.	☐	☐
5.	Developed a training plan for staff and stakeholders to promote a shared understanding of the values enshrined in the Code of Conduct for Public Bodies and the Code of Conduct for Suppliers and Contractors.	☐	☐
6.	Implemented the Training Pan to ensure that staff and stakeholders are adequately sensitised to the ethical requirements and standards of behaviour outlined in the Codes.	☐	☐
	B. Internal Control Framework for Procurement, Retention & Disposal of Public Property		
7.	Developed an Internal Control Framework for Procurement, Retention and Disposal of public property in keeping with the Handbook with General Guidelines: Framework of Internal Control for Procurement issued by the Office. Select the applicable option(s): 1: Comply with the Handbook with General Guidelines: Framework of Internal Control for Procurement issued by the Office. 2: Prepare Handbooks with Special Guidelines, using the Office's prescribed template; and 3: Submit the completed Handbook with Special Guidelines to the Office for approval.	☐ ☐ ☐	☐ ☐ ☐

	COMPLIANCE ASSESSMENT CHECKLIST - 2025	Yes	No
8.	Established a Delegation of Authority for the conduct and management of procurement and disposal activities.	☐	☐
9.	Developed a system to monitor and control the reporting of "one-time" waivers granted to suppliers and contractors under Regulations 10(1)-(4) of the Simplified Procurement Regulations, 2024.	☐	☐
10.	Established and maintains a Register of Complaints as required under Regulation 47(1) of the Simplified Procurement Regulations, 2024.	☐	☐
	C. Institutional Capacity Assessment and Organisational Structure for Procurement, Retention & Disposal		
11.	Conducted an Institutional Capacity Assessment to evaluate the Public Bodies capacity to effectively and efficiently execute procurement, retention, and disposal activities in compliance with the Act, Regulations and Handbook with General Guidelines.	☐	☐
12.	Assessed the Capacity Needs of the Public Body to undertake Procurement, Retention and Disposal of public property based on the mandate and characteristics of the Public Body (size, expenditure, risk, and quantum of disposals) and in keeping with: ▪ The Training Standards, Competence Levels and Certification Requirements for Procurement; and ▪ The Training Standards, Competence Levels and Certification Requirements for Retention and Disposal of Public Property	☐	☐
13.	Established an Organisational Structure for Procurement, Retention and Disposal that reflects the capacity needs identified.	☐	☐
14.	Defined Functional Responsibilities and Reporting Relationships within the Public Body and the Procurement and Disposal Unit in alignment with the Handbook with General Guidelines: Framework for Internal Control.	☐	☐
15.	Developed Job descriptions and Budget(s) for the recruitment, training, development, and retention of staff with the required competencies.	☐	☐
16.	Obtained the necessary Approval(s) and Budget(s) for the staffing and operations of the Procurement and Disposal Unit.	☐	☐
	D. Procurement, Retention & Disposal Functions		
17.	Appointed a 'Named' Procurement Officer (NPO) with the appropriate level of competence to manage the procurement and disposal portfolio of the Public Body.	☐	☐

	COMPLIANCE ASSESSMENT CHECKLIST - 2025	Yes	No
18.	The Office was notified in writing, of any changes to the name and designation of the NPO, as required by the Act.	☐	☐
19.	Assigned a trained, technically capable Public Officer to effectively oversee and manage the receipt, storage, issuance, disposal and identification of stores and equipment (Stores & Inventory Management Officer).	☐	☐
20.	An assigned Public Officer was delegated to perform functions in relation to the effective retention of stores and equipment.	☐	☐
	E. Systems & Safeguards to Support Public Procurement, Retention & the Disposal of Public Property		
21.	Established a system to assess and manage risks associated with procurement, retention and disposal activities, using appropriate risk management software, tools, and techniques.	☐	☐
22.	Established a comprehensive Records Management System.	☐	☐
23.	Implemented systems to facilitate timely response to, and dissemination of, information and/or documentation to relevant stakeholders.	☐	☐
24.	Established and maintains measures to safeguard the integrity, reliability and accuracy of procurement and disposal records, both in hard copy and where possible, in electronic format.	☐	☐
25.	Established a Stores and Inventory Management System to manage stock levels, (including economic order quantities, reorder levels, and where appropriate, buffer stock in an electronic format (where possible).	☐	☐
26.	Assessed the risks associated with the retention and disposal of personal property of the public body and implemented appropriate risk mitigation strategies based on the impact and likelihood of the risks identified.	☐	☐
27.	Implemented measures to safeguard and maintain public property, based on identified risks.	☐	☐
28.	Developed a written risk mitigation policy outlining the objectives for the retention of stores and equipment in accordance with the objects of the Act and Regulations.	☐	☐
29.	Notified the Office of the name, designation, and contact details of the Accounting Officer and 'Named' Procurement Officer via official	☐	☐

	COMPLIANCE ASSESSMENT CHECKLIST - 2025	Yes	No
	correspondence, using the Office's template, "Public Body's Letter Template – New User Request" (to be granted access to the Procurement Depository).		
30.	Obtained access to the Procurement Depository and reviewed the resources available on the Office's website in relation to utilising the Procurement Depository.	☐	☐
31.	Created appropriate Line(s) of Business on the Procurement Depository, selecting the relevant UNSPS code(s) that accurately correspond to the goods, works and services being procured by the Public Body.	☐	☐
32.	Assessed requests for pre-qualification from suppliers and contractors.	☐	☐
33.	Updated information on the Procurement Depository to reflect all disposals.	☐	☐
34.	Established and maintains an internal registry of suppliers or contractors for micro-procurement activities, in keeping with Regulations 26 and 27 of the Simplified Procurement Regulations, 2024.	☐	☐
	F. Handbooks with Guidelines		
35.	Complied with the Handbook with General Guidelines issued by the Office or developed Handbook with Special Guidelines on Public Procurement, Retention and Disposal of Public Property in conformance with the template and guidelines issued by the Office. Select the appropriate option(s): 1: Comply with the Handbook with General Guidelines issued by the Office in relation to Public Procurement, Retention & Disposal. 2: Prepare Handbooks with Special Guidelines, using the Office's prescribed template; and 3: Submit the completed Handbook with Special Guidelines to the Office for approval.	☐ ☐ ☐	☐ ☐ ☐
	G. Procurement & Disposal Advisory Committee (PDAC) & Disposal Committee		
36.	Appointed members and alternate members to the Procurement and Disposal Advisory Committee (PDAC) comprising: ▪ Corporate Secretary/Head of Legal ▪ Head of Finance ▪ Subject Matter Expert ▪ such other members as may be necessary	☐	☐

	COMPLIANCE ASSESSMENT CHECKLIST - 2025	Yes	No
37.	Developed Terms of Reference for the PDAC and informed members of their roles and responsibilities, including review of reports, recommendations for contract award and procurement proceedings and property disposal files to ensure: ▪ adherence to the Act and the Regulations; ▪ adherence to the Handbook with General Guidelines; ▪ adherence to the approved procurement/disposal strategy; and ▪ achievement of the objects of the Act.	☐	☐
38.	Established a Disposal Committee comprising no less than three (3) officers as required.	☐	☐
39.	Developed Terms of Reference for the Disposal Committee and informed members of their roles and responsibilities in recommending the most appropriate method of disposing of unserviceable, obsolete, or surplus stores or equipment in keeping with the Act.	☐	☐
	H. Training & Capacity Building		
40.	Provided internal training for staff: sensitising staff on the Public Procurement and Disposal of Public Property Act, Regulations, Handbook with General Guidelines and Handbook with Special Guidelines approved by the Office for the Public Body.	☐	☐
41.	Assessed the competencies of the Staff of the Procurement and Disposal Units annually against the Standards developed by the Office. ▪ Training Standards, Competence Levels and Certification Requirements for Procurement; ▪ Training Standards, Competence Levels and Certification Requirements for Retention and Disposal of Public Property	☐	☐
42.	Developed a Capacity Development Plan for the staff of the Procurement and Disposal Unit based on any gaps identified.	☐	☐
43.	Provided training opportunities to procurement and disposal staff based on any gaps identified in performance/competence.	☐	☐
	I. Annual Procurement Plan & Annual Schedule of Planned Procurement Activities		
44.	Prepared the Annual Procurement Plan (APP) and Annual Schedule of Planned Procurement Activities (ASPPA) within six (6) weeks of the approval of National Budget and obtained the approval of the Accounting Officer.	☐	☐

	COMPLIANCE ASSESSMENT CHECKLIST - 2025	Yes	No
45.	Published the Annual Schedule of Planned Procurement Activities (ASPPA) for the current fiscal on ProcureTT, the Public Body's website or any other electronic format.	☐	☐
	J. Mechanism for compliance with the Reporting Requirements		
46.	Published notices of award of procurement contracts or framework agreements for procurement valued over One Million Dollars (TTD 1 Mn) upon entry into force of a procurement contract or conclusion of a framework agreement on ProcureTT, the Public Body's website or any other electronic format.	☐	☐
47.	Prepared and submitted quarterly reports to the Office.	☐	☐
48.	Prepared the Annual Procurement Performance Report, within six (6) weeks of the end of the fiscal year, in accordance with the Annual Procurement Performance Report Template issued by the Office.	☐	☐
49.	Prepared and submitted ALL other reports as requested by the Office.	☐	☐
50.	Established internal mechanisms to ensure timely compliance with all statutory and regulatory Reporting requirements of the Act, Regulations and Handbooks with General Guidelines.	☐	☐
51.	Submitted quarterly reports to the Office on the status or outcome of each complaint.	☐	☐
	K. Internal Systems to Monitor Performance & Ensure Compliance		
52.	Developed and implemented an action plan to ensure ongoing compliance with the Act, Regulations and Handbooks with General Guidelines.	☐	☐
53.	Established internal monitoring mechanisms to regularly evaluate the performance of the procurement and disposal functions.	☐	☐
54.	Continuously monitor the execution of procurement and disposal against performance plans and identify weaknesses, gaps or non-compliance.	☐	☐
55.	Implemented corrective and improvement measures to address identified gaps, ensuring continuous enhancement of procurement and disposal functions and institutional integrity.	☐	☐